



Requirements for Fire Training

Air Pollution Control Program technical bulletin

5/2003

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Introduction

This technical bulletin addresses the Missouri Department of Natural Resources' regulatory requirements for fire training exercises conducted by fire protection agencies. DNR recognizes that these exercises, when conducted in a planned manner, provide an invaluable training tool for fire protection personnel. This bulletin addresses only those requirements that are the regulatory responsibility of the Department.

Two Department programs administer and enforce statutes and regulations that affect fire training exercises. These are the Air Pollution Control Program (APCP) and the Solid Waste Management Program (SWMP). Other agencies such as the U.S. Environmental Protection Agency (EPA) and National Fire Protection Association (NFPA) also have requirements or guidelines related to fire training.

Requirements

Air Pollution Control Program

Fires set for the purpose of training and instructing fire protection personnel in the methods of fighting fires are presently exempt from Missouri's outstate open burning regulation, 10 CSR 10-3.030. This exemption does not apply if the exercise does not conform with the limitations described in the regulation, causes or constitutes a hazard to vehicular or air traffic or causes a violation of any other state regulation. This exemption is expressly intended for fire training exercises only and does not authorize the intentional burning of a structure as a method of demolition or disposal. A liability waiver from the owner of the property used in the exercise does not relieve the property owner, fire department or district from responsibility under applicable statutes and regulations. Notification of the planned training exercise is required to the Department or a local air pollution control agency. Site specific permits are required by the Department or local air pollution control agencies for any open burning activities in the following areas: St. Louis city and county; St. Charles, Franklin and Jefferson counties; Kansas City, Clay, Ray, Platte, Cass, Buchanan and Jackson counties; and the city of Springfield and Greene County.

Federal regulation 40 CFR Part 61, Subpart M National Emission Standard for Asbestos (NESHAP), requires that asbestos containing materials (ACM) be removed from a structure prior to the start of fire training. A state certified inspector must be used to assess a building for ACM. A list of certified inspectors is available from APCP's, Asbestos Unit at (573) 751-4817.

APCP has jurisdiction for asbestos removal projects in the outstate area. The outstate area includes all of Missouri except St. Louis city and county, Kansas City proper and Springfield proper. Local agencies are responsible for implementation of the asbestos requirements in these areas. In general, in the outstate area, if the asbestos survey identifies friable ACM, or nonfriable category I or II ACM in poor condition, in quantities greater than 160 square feet, 260 linear feet or 35 cubic feet (threshold quantities), a state registered asbestos abatement contractor must be used to remove the ACM. ACM in less than threshold quantities do not have to be removed prior to fire training according to the NESHAP. However, the Department strongly encourages all ACM be removed from a structure that is to be intentionally burned. A certified asbestos contractor is not required to remove ACM in less than threshold quantities; however, those doing the removal should follow proper work and disposal practices. Government employees removing small amounts of friable ACM are subject to EPA's Worker Protection Rule. Private sector employee's removing ACM are subject to the Occupational Safety and Health Administration (OSHA) asbestos standard.

Nonfriable ACM in good condition is not subject to Department of Natural Resources regulation and may be removed by anyone providing they use proper work and disposal practices and do not make the material friable. Personal protective equipment, including clothing and high efficiency particulate air (HEPA) filters, should be worn during removal. Disposal at a permitted solid waste facility is required. A technical bulletin on asbestos requirements is available from the Departments' Technical Assistance Program at 1-800-361-4827 or may be obtained from the Department's Web site at www.dnr.mo.gov/oac/pubs.htm.

For projects occurring in areas other than the outstate area, the local agency with jurisdiction should be contacted. Local agencies may be contacted at the following numbers:

Jurisdiction	Agency	Telephone
Kansas City proper	Kansas City Health Department, Air Quality Section	(816) 513-6314
St. Louis City proper	St. Louis Division of Air Pollution Control	(314) 613-7300
St. Louis County	St. Louis County Health Department	(314) 615-8923
Springfield proper	Springfield-Greene County Health Department	(417) 864-1662

Solid Waste Management Program

The Solid Waste Management regulations require that demolition waste or any waste (including ash) that remains after a fire training exercise be properly disposed of at a permitted solid waste facility. Only clean fill may remain on site or be disposed of in a location other than a permitted solid waste facility. Clean fill is defined as uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblock and brick. Materials may contain only minimal amounts of wood or metal or other inert solids as approved by the Department to qualify as clean fill.

Additional Information

EPA requires any owner or operator to provide written notification of any regulated demolition activity (excluding residential buildings having four or fewer dwelling units), including fire training exercises. These notification requirements are found in 40 CFR Part 61, Subpart M, § 61.145. The Department has delegated authority in enforcing the provisions of this regulation. This regulation may be viewed at <http://www.epa.gov/asbestos>. Notifications for projects in the outstate area should be submitted to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Projects in other areas of the state should be submitted to the appropriate local agency.

The Department's Geological Survey and Resource Assessment Division (GSRAD) requires any wells that will be or are permanently abandoned on a site be properly plugged. A technical bulletin on well and cistern abandonment may be obtained from GSRAD by calling (573) 368-2165.

For more information call or write:

Missouri Department of Natural Resources

Solid Waste Management Program

P.O. Box 176, Jefferson City, MO 65102-0176

1-800-361-4827 or (573) 751-5401 office

(573) 526-3902 fax

www.dnr.mo.gov/alpd/swmp Program Home Page

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Air Pollution Control Program

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